

July 23, 2021

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Re: Comments to the Inyo National Forest CRMP

This letter transmits the comments of Trout Unlimited (TU), the California Council of Trout Unlimited and the California Chapter of Backcountry Hunters and Anglers (BHA) on the Draft Conservation River Management Plans for two Wild and Scenic Rivers – Owens River Headwaters and Cottonwood Creek released June 23, 2021.

Trout Unlimited is the largest and oldest sportsmen's group dedicated to coldwater conservation in America. TU's mission is to conserve, protect and restore trout and salmon fisheries and their watersheds in North America. Trout Unlimited has over 300,000 members and supporters nationwide, with over 10,000 members in California. Our members and supporters care deeply about California's inland trout waters and dedicate thousands of volunteer hours each year to local projects that improve and restore coldwater habitats and coldwater fishing opportunities.

Backcountry Hunters & Anglers is a national organization whose mission is to sustain America's heritage of fishing and hunting in a natural setting, through education and work on behalf of clean water and wild backcountry lands. BHA works to preserve for future generations the peace, quiet, and sense of freedom that make hunting and fishing unique outdoor activities and that may be lost to the pressures of human population, industry and technology. BHA believes in keeping public lands healthy and accessible, in managing wildlife as a public trust, and in protecting the large natural areas and natural functions that support our hunting and fishing heritage.

The Inyo National Forest, and the project area specifically, harbor a diverse wealth of habitats for coldwater fish and upland game species and provides some of the best and most unique fishing and hunting opportunities in the West. Trout Unlimited and BHA are interested parties in the management of the Owens River Headwaters and Cottonwood Creek because of their nexus with high quality mule deer and Bi-State Sage Grouse habitat, and wild trout and Paiute Cutthroat Trout populations. Below we articulate our comments on the draft CRMPs by topic area:

Outstanding Remarkable Values

The Wild and Scenic Rivers Act requires that designated rivers possess one or more Outstandingly Remarkable Values (ORV) and we concur with the Forest Service and BLM determination that both the Upper Owens River Headwaters and Cottonwood Creek possess ORVs in the recreation and wildlife resources assessment categories. We support the identification that both river segments have ORV recreation components that include hunting and fishing. We also concur with the Forest Service's determination that the USFS-managed section of Cottonwood Creek has ORVs in the fisheries category due to the presence of a

critical broodstock population of one of the rarest trout species in North America – the Paiute cutthroat. This ORV is a high priority for TU and BHA due to our commitment to recovering listed or at-risk game and sportfish species; in fact, TU has worked for three decades with the California Department of Wildlife and the Forest Service to restore the Paiute cutthroat to the single drainage (Silver King Creek) that constitutes its original native range. Given the precarious status of the Paiute cutthroat, we must manage those streams where broodstock populations have been established to prioritize habitat conservation and restoration. We suggest the CRMP offer more specific guidance in how to achieve this objective in Cottonwood Creek.

Draft Management Direction – Owens River Headwaters & Cottonwood Creek

Cottonwood Creek - The desired conditions, management standards, management actions and potential future management actions vary between the Forest Service and BLM sections which may lead to inconsistent riverine condition. For example, the Forest Service segment identifies several “standards” which must be upheld to protect Wild and Scenic condition, whereas there are no “standards” in the BLM segment. Conversely, the BLM segment’s management actions and future management actions focus heavily on fish and wildlife habitat restoration, where the Forest Service segment offers no such actions. We applaud the BLM’s efforts to incorporate fish and wildlife focused restoration activities into their management actions and encourage the Forest Service to do the same in the designated resource area.

Our primary concern related to the current draft management direction for Cottonwood Creek would be lack of consistency across stream segments. We suggest that the Forest Service and BLM work together to find a more cohesive plan across their two parcels.

Upper Owens River Headwaters

The presented management direction appears to protect basic Wild and Scenic River characteristics though it lacks management actions to be taken to meet the desired conditions for high quality fish and wildlife habitat. We suggest the Forest Service revisit Upper Owens River Headwaters management actions and future management actions and incorporate actions similar to those presented by the BLM in Cottonwood Creek segment.

Conclusion

Trout Unlimited and BHA are committed to protecting the Inyo National Forest’s unique habitat, fish, and wildlife values while also sustaining and enhancing the Forest’s sporting opportunities. We appreciate the opportunity to participate in the Wild and Scenic River Comprehensive River Management Plan development process and look forward to working cooperatively with the Forest Service and BLM to incorporate such management direction into the final plans.